

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZACHARY BEAN,

Plaintiff,

v.

NCO FINANCIAL SYSTEMS, INC.,

Defendant.

Case No. 2:12-cv-00293-PBT

**UNOPPOSED MOTION TO ADJOURN
JULY 26, 2012 ARBITRATION**

PLEASE TAKE NOTICE that, on a date and time to be set by the Court, counsel for defendant NCO Financial Systems, Inc. shall move for entry of an Order adjourning the July 26, 2012, Arbitration date. Counsel for plaintiff consents to the instant request. Counsel provides the following in support of the instant request:

1. This is the second request to adjourn the Arbitration in this matter.
2. The original Arbitration was set for June 28, 2012, but the parties secured from the Arbitration Office an adjournment in light of the fact they had hoped to resolve the matter via settlement.
3. The parties continue their diligent efforts to settle the matter. They now have winnowed the issues and are hopeful of reaching an accord.
4. Given that the parties have focused their efforts on resolving the matter, they have not been able to conduct vital depositions and require additional time to do so.
5. Further, the undersigned will be out of the office in July and has scheduling

conflicts the balance of the month, including an obligation in an earlier-filed case on the day of the current arbitration date. The undersigned will also be absent from the office the week of August 6, 2012.

6. The parties are confident, should they be permitted additional time to discuss settlement and to further narrow the issues via enlightening depositions, they will be better able to resolve the matter in a less costly way for all parties (including the Court by not having to drain its limited and valuable resources).

7. Given the undersigned's schedule, the need for the parties to schedule depositions in this matter (mindful that the participant's schedules (including counsel) must also be taken into consideration), and the parties' commitment to using all available time to attempt to settle the matter, the undersigned requests (with the adversary's consent) that the Arbitration in this matter be adjourned until a date after September 28, 2012.

For the foregoing reasons, the undersigned requests the Court adjourn the July 26, 2012, Arbitration in this matter until a date after September 28, 2012.

Dated: June 27, 2012

Respectfully submitted

/s/ Aaron R. Easley

Aaron R. Easley, Esq. (73683)

SESSIONS, FISHMAN, NATHAN, & ISRAEL, L.L.C.

200 Route 31 North, Suite 203

Flemington, NJ 08822

Telephone: (908) 751-5940

Facsimile: (908) 751-5944

aeasley@sessions-law.biz

Attorneys for Defendant

NCO Financial Systems, Inc.

CERTIFICATE OF SERVICE

I certify that on this 27th day of June 2012, a copy of the foregoing **Unopposed Motion to Adjourn the July 26, 2012 Arbitration** was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including plaintiff's counsel as described below. Parties may access this filing through the Court's system.

Craig T. Kimmel, Esq.
Kimmel & Silverman, P.C.
30 East Butler Pike
Ambler, PA 19002
Tel.: (215) 540-8888
Fax.: (800) 863-1689
kimmel@creditlaw.com
Attorney for Plaintiff

/s/ Aaron R. Easley
Aaron R. Easley, Esq.
Attorney for Defendant
NCO Financial Systems, Inc.